

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

THE LAMPO GROUP, LLC d/b/a)	
RAMSEY SOLUTIONS,)	
a Tennessee Limited Liability Company,)	
Plaintiff,)	
v.)	Case No. 3:20-cv-00641
)	Judge Aleta A. Trauger
MARRIOTT HOTEL SERVICES, INC.,)	
a Delaware Corporation;)	
Defendant.)	
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MARRIOTT HOTEL SERVICES, INC.,)	
a Delaware Corporation,)	
Counter-Plaintiff,)	
v.)	
THE LAMPO GROUP, LLC d/b/a)	
RAMSEY SOLUTIONS,)	
a Tennessee Limited Liability Company,)	
Counter-Defendant.)	
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**JOINT MOTION FOR MODIFY CERTAIN SCHEDULING DEADLINES
IN THE INITIAL CASE MANAGEMENT ORDER**

The Lampo Group, LLC d/b/a Ramsey Solutions and Marriott Hotel Services, Inc., by and through counsel, respectfully move to extend certain pre-trial deadlines in the Initial Case Management Order issued on October 19, 2020 [Dkt. 31] (the “Scheduling Order”), and in support thereof state:

1. Currently, the fact discovery cut-off is June 30, 2021 the disclosure of experts and their reports, depending on the party with the burden of proof is April 9, 2021 and June 8, 2021,

respectively. The dispositive motion deadline is September 27, 2021. Trial is set to begin February 15, 2022. As outlined below, the parties have agreed that additional time is required to complete certain pre-trial tasks.

2. Unfortunately, due to some COVID related issues, Ramsey Sought an extension of time to respond to discovery. While Marriott agreed, it believed it would be necessary to extend fact discovery due to the additional time relating to Ramsey Solutions' production. Rather than do so piecemeal, Ramsey Solutions suggested that the expert deadlines likewise be extended. Marriott does not oppose doing so. Rather than wait until the time is upon them, the parties believe it is prudent to move certain deadlines at this time. Obviously, the parties will continue to work diligently to timely complete all necessary pre-trail requirements.

3. The parties are requesting to modify the Scheduling Order as follows:

- a. Dispositive Motions: Deadline to file dispositive motions would be changed to **October 8, 2021**;
- b. Fact Discovery: Deadline to complete all written discovery and depose all fact and expert witnesses would be changed to **September 3, 2021**;
- c. Expert Deadlines: Deadlines to identify and disclose all expert witnesses and reports would be changed to:
 - i. **May 24, 2021** for the party who bears the burden of proof on an issue for which expert testimony is offered; and
 - ii. **July 23, 2021** for the party who does not bear the burden of proof on an issue for which expert testimony is offered.

4. The Motion is not interposed for any improper purpose or to cause delay. The parties are hopeful that the above modifications to the scheduling order will allow them to

efficiently complete these pre-trial activities. Further, the above changes do not in any way impact the existing Order Setting Case For Trial [Dkt. 32] and they do not currently foresee any reason to seek a change in the existing dates in that order.

WHEREFORE, based on the foregoing, the parties jointly move to modify the Scheduling Order as outlined herein.

Respectfully submitted,

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